

# Exhibit 7

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

IN RE: NATIONAL : HON. DAN A. POLSTER  
PRESCRIPTION OPIATE :  
LITIGATION :  
:   
APPLIES TO ALL CASES :NO.  
:1:17-MD-2804

- HIGHLY CONFIDENTIAL -

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

- - -  
December 13, 2018  
- - -

Videotaped sworn deposition of  
DAVID A. MYERS, JR., taken pursuant to  
notice, was held at LIEFF CABRASER  
HEIMANN & BERNSTEIN, LLP, 250 Hudson  
Street, 8th Floor, New York, New York,  
beginning at 9:15 a.m., on the above  
date, before Margaret M. Reihl, a  
Registered Professional Reporter,  
Certified Shorthand Reporter, Certified  
Realtime Reporter, and Notary Public.

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1           A.       Thank you.

2           Q.       Do you remem -- you recall about  
3   when you were promoted to senior manager of  
4   product operations?

5           A.       Well, it wasn't a promotion, it  
6   was just a title change. The job just morphed  
7   into something else. You know, different  
8   companies will call you something different.  
9   And, again, the communications portion came off,  
10   so the communications portion came off of my  
11   title.

12          Q.       Did that happen in conjunction  
13   with the Watson acquisition?

14                   MS. MAHONEY: Objection.

15                   THE WITNESS: It became more in  
16                   conjunction with Teva acquisition.

17   BY MR. MELAMED:

18          Q.       So is it accurate to say you were  
19   senior manager of products and communications up  
20   until the Teva acquisition?

21          A.       Yes.

22          Q.       And at that point you became  
23   senior manager of product operations at Teva,  
24   right?

1           A.       Yes, but at Watson, we -- when it  
2   was Watson Actavis, because Watson bought  
3   Actavis and then changed their name to Actavis,  
4   so it's a little confusing.

5           Q.       It is.

6           A.       Watson did not believe in really  
7   advertising generic pharmaceuticals. So  
8   although random things would come up for me,  
9   rarely did I get involved in communications,  
10   even though the title didn't change, just so you  
11   know.

12          Q.       When you were senior manager of  
13   products and communications at Actavis from,  
14   let's say -- do you recall who you reported to  
15   when you were in that position?

16          A.       As senior manager?

17          Q.       Yes.

18          A.       I was promoted by Jinping  
19   McCormick, and then when Watson bought Actavis,  
20   Jinping did not go on with the company, and then  
21   I reported to Napoleon Clark.

22          Q.       Did you report to Jinping  
23   McCormick prior to the Watson acquisition?

24          A.       Yes.

1 Q. When did you start reporting to  
2 Jinping McCormick?

3           A.       I don't remember the specific  
4    date.

5 Q. Is it -- was that -- did you  
6 start reporting to Jinping McCormick in or  
7 around 2010 when you were promoted to senior  
8 manager?

9                   A.       Yes, she promoted me.

10 Q. Okay. Prior to being promoted to  
11 senior manager, do you recall to whom you  
12 reported in 2009 as the manager of products and  
13 communications?

14           A.       That may have been Jinping then  
15   too. In 2009, I think so.

16 Q. Do you recall in 2008?

17 MS. MAHONEY: Objection.

18 THE WITNESS: I'm not exactly  
19 sure. I don't know when Jinping became  
20 director of marketing.

21 BY MR. MELAMED:

22 Q. Prior to Jinping McCormick  
23 becoming -- let me withdraw that.

24                      Upon Jinping McCormick becoming